

General in the annual report of the person, copartnership, association, bank, national bank, or other corporation holding such moneys or property, but which were afterwards returned to the Auditor General in special reports to that officer, or which were not reported to him but were ascertained by his agents, may be advertised in the foregoing manner, for the same period; at any time, and notice by mail to the several depositors, beneficiaries, or creditors shall be given in such cases as soon as the items are reported or otherwise ascertained.

§ 282. *Escheat of deposits, etc.; enforcement; rights of creditors; decree; bill for discovery.*

FILE COPY

Office-Supreme Court, U.S.  
**FILED**

**MAY 31 1962**

**JOHN F. DAVIS, CLERK**

IN THE

# Supreme Court of the United States

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**October Term, 1961.**

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**No. 13 Original.**

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**STATE OF TEXAS,**

*Plaintiff,*

*v.*

**STATE OF NEW JERSEY, ET AL.,**

*Defendants.*

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**RESPONSE OF DEFENDANT, SUN OIL COMPANY, TO  
PLAINTIFF'S MOTION FOR LEAVE TO FILE  
BILL OF COMPLAINT.**

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**HENRY A. FRYE,** ✓

**PEPPER, HAMILTON & SCHEETZ,**

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Philadelphia 9, Penna.,

*Attorney for Defendant, Sun Oil  
Company, 1608 Walnut Street,  
Philadelphia 3, Penna.*

IN THE  
Supreme Court of the United States.

OCTOBER TERM, 1961.

No. 13 ORIGINAL.

STATE OF TEXAS,

*Plaintiff,*

*v.*

STATE OF NEW JERSEY, ET AL.,

*Defendants.*

**RESPONSE OF DEFENDANT, SUN OIL COMPANY TO  
PLAINTIFF'S MOTION FOR LEAVE TO FILE  
BILL OF COMPLAINT.**

In accordance with the order of the Court entered May 14, 1962, Defendant, Sun Oil Company, by its attorney, respectfully responds to the prayer for temporary injunction contained in subparagraph (4) of Paragraph XIX of the Complaint attached to Plaintiff's Motion for Leave to File Bill of Complaint, as follows:

(4) Defendant, Sun Oil Company, joins in the prayer of Plaintiff that a temporary injunction be issued restraining Defendant, Sun Oil Company, from paying, delivering or in any manner relinquishing the property identified in Plaintiff's Complaint or any other property to the Defendants, the State of New Jersey, the Attorney General of New Jersey, the State of Pennsylvania and the Attorney General of Pennsylvania or to any other person or entity, including Plaintiff, pending further orders of this Court.

.....  
HENRY A. FRYE,

*Attorney for Defendant,  
Sun Oil Company.*

### PROOF OF SERVICE.

I, Henry A. Frye, attorney for Defendant, Sun Oil Company, and a member of the Bar of the Supreme Court of the United States, hereby certify that on the ~~29th~~ day of *May*, 1962, I served copies of the foregoing Response of Defendant, Sun Oil Company, to Plaintiff's Motion for Leave to File Bill of Complaint on each of the other parties to this action by depositing copies in a United States post office or mail box, as certified mail with first class postage or air mail postage prepaid, and addressed to:

- (1) Honorable Price Daniel  
Governor of Texas  
State Capitol  
Austin, Texas
- (2) Honorable Will Wilson  
Attorney General of Texas  
Courts Building  
Austin 11, Texas
- (3) Honorable Richard J. Hughes  
Governor of New Jersey  
State Capitol  
Trenton, New Jersey
- (4) Honorable David D. Furman  
Attorney General of New Jersey  
State Capitol  
Trenton, New Jersey
- (5) Honorable David L. Lawrence  
Governor of Pennsylvania  
State Capitol  
Harrisburg, Pennsylvania
- (6) Honorable David Stahl  
Attorney General of Pennsylvania  
State Capitol  
Harrisburg, Pennsylvania

It is further certified that copies of the Response of Defendant, Sun Oil Company, to plaintiff's Motion for Leave to File Bill of Complaint have been served on the states named in Paragraph VI of Plaintiff's Complaint by depositing copies in a United States post office or mail box, as certified mail with first class postage or air mail postage prepaid and addressed to the Governors and Attorneys General of each of such states.

.....  
HENRY A. FRYE,  
*Attorney for Defendant,*  
*Sun Oil Company.*